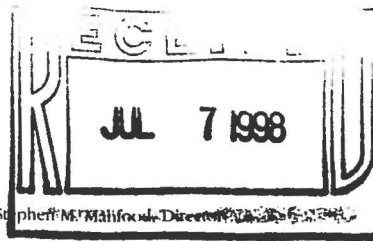


St. Louis City (HW)
~~The~~ Norman Corporation



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • Stephen M. Mahoney, Director

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
10805 Sunset Office Drive, Suite 100 St. Louis, MO 63127-1038
(314) 822-0101
FAX (314) 822-0943

June 23, 1998

CERTIFIED MAIL #P 495 751 204
RETURN RECEIPT REQUESTED

Mr. Matt Buha
President
The Norman Corporation
5900 North Broadway
St. Louis, MO 63147

Dear Mr. Buha:

Enclosed is a report of a hazardous waste and resource recovery inspection conducted at The Norman Corporation on June 3, 1998, by Mr. Charles Heinzman of my staff. The purpose of the inspection was to determine the compliance status of the facility with regard to applicable federal and state hazardous waste management laws and regulations. Please note that the section titled "UNSATISFACTORY FEATURES" lists violations noted during the inspection and outlines steps to correct those violations. Violations observed during the inspection warrant the issuance of Notice of Violation (NOV) #5118 (enclosed). The report also contains an "Information Request" section which asks for additional information and clarification on some of your operations.

Within 15 days of receipt of the report and NOV, a written response must be submitted that describes the actions taken to address the violations. Please submit your response to: Ms. Kathy Flippin, Chief, Hazardous Waste Enforcement Unit, Missouri Department of Natural Resources, P. O. Box 176, Jefferson City, Missouri 65102. Also send a copy of your response to Mr. Heinzman at the St. Louis Regional Office, 10805 Sunset Office Drive, Suite 100, St. Louis, Missouri 63127.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Robert S. P. Eck
Regional Director

RSPE:CH:al

Enclosure

c: Ms. Kathy Flippin, Hazardous Waste Program, Enforcement

A001



R00175793
RCRA RECORDS CENTER

RESOURCE CONSERVATION AND RECOVERY ACT
AND
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT
AND
RESOURCE RECOVERY INSPECTION

FACILITY:

The Norman Corporation
5900 North Broadway
St. Louis, MO 63147
(314) 382-5900

EPA ID #: MOD031003569
Mo. Generation ID#: 002738
RR0180

PARTICIPANTS:

Department of Natural Resources

Charles Heinzman (MDNR)
Environmental Specialist
St. Louis Regional Office

The Norman Corporation

Mr. Matt Buha
President

Mr. Walter Gilliam
Plant Manager

INTRODUCTION:

An inspection of The Norman Corporation (Norman) located at the above address was conducted on June 3, 1998. On June 5, 1998, Mr. Matt Buha met with Charles Heinzman and Mike Struckhoff at the St. Louis Regional Office to provide more information following the inspection at Norman.

The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Hazardous Waste Management Law (1977) as amended. The inspection was confined to facets of the operation relevant to both hazardous waste management and the resource recovery operation. A copy of the statute concerning inspection authority and confidential information was provided to Mr. Buha on the day of the inspection.

FACILITY DESCRIPTION:

Norman is a commercial laundry and dry cleaner specializing in cleaning gloves, shop towels and lab coats for businesses. The facility employs about forty-five employees and has been at the North Broadway location for about five years.

The Norman facility consists of a wet laundry located in one building and a dry-cleaning operation in another building (attachment #1). Dirty materials are cleaned by wet washing or dry cleaning depending upon the customers needs. Some dirty materials, like leather products, can only be dry cleaned.

The wet laundry process used water and industrial cleaning products. Waste water from the wet laundry is treated prior to being discharged to the St. Louis Metropolitan Sewer District. Waste filtercake from the process is disposed of as a special waste at the Milam Recycling & Disposal Facility in East St. Louis, IL.

In the dry-cleaning process, dirty textiles, rags, wipers, gloves, etc. are placed in one of the three, dry-cleaning machines. Once used stoddard solvent from the last cycle of the previous load is pumped into a machine for the first cycle. Dirty solvent from the machine drains through a piping system into a 450-gallon storage pit. The solvent is strained as it enters the pit and then it's pumped by pipe to two 1000-gallon dirty solvent tanks. The solvent then is transferred by gravity to two stills for resource recovery. A diagram of the flow process for the dry-cleaning process can be found in attachment #2.

A diagram of the resource recovery process is in attachment #3 and a narrative of the process in attachment #4. Norman has two Washhex Vacuum stills, a 200-gpm capacity still and a 500-gpm capacity still. Clean solvent, after distillation is returned to the two "clean" tanks for reuse. What Norman calls a "residual oil" from the distillation of dirty solvents is burned in an on-site fuel boiler. The generation process and disposition of the residual oil is not discussed in the information from Norman concerning resource recovery. The residual oil is discussed in Norman's application to the City of St. Louis for construction or modification, prior to operation, of an air pollution source within the City of St. Louis.

Norman has the following tanks outside the dry-cleaning building: two for dirty solvent, two for clean solvent, one for waste/residual oil and one for standby use.

Norman generates the following wastes:

1. Waste petroleum distillates identified by Norman as D001 hazardous waste from cleaning out the stills. About 300 gallons are generated per month with disposal at Chemical Conservation of Georgia.
2. Waste sludge identified by Norman as D001 hazardous waste from cleaning out the 1000 gallon above ground tanks used to hold dirty solvent prior to being distilled. About 50 gallons per month are generated with disposal at Chemical Conservation of Georgia.

UNSATISFACTORY FEATURES:

1. No containment system, in violation of 10 CSR 25-5.262(2)(C)2.D(I). Nineteen fifty-five-gallon drums and one thirty-gallon drum of liquid hazardous waste (D001) were stored in the

hazardous waste storage area inside the wet laundry building on the east side without secondary containment. The facility must install a containment system having a capacity equal to 10 percent of the containerized waste volume or the volume of the largest container, whichever is greater. The St. Louis Regional Office (SLRO) received a June 5, 1998, letter from the facility stating that it planned to complete a containment area by July 30, 1998. The facility must submit documentation describing the containment area as soon as construction is complete.

2. Containers of hazardous waste not labeled, in violation of 10 CSR 25-5.262(2)(C)1 incorporating 40 CFR 262.31. Nineteen fifty-five-gallon drums and one thirty-gallon drum of hazardous waste (D001) in the hazardous waste storage area were not labeled with Department of Transportation labels. The facility must label these hazardous waste containers and all hazardous waste containers generated in the future in accordance with the applicable Department of Transportation (DOT) regulations during the entire on-site storage period. The facility must certify that the containers have been labeled.
3. Accumulation date not marked on containers of hazardous waste, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2). Nineteen fifty-five-gallon drums and one thirty-gallon drum of hazardous waste (D001) in the hazardous waste storage area were not marked with the date of accumulation. The facility must mark the beginning date of accumulation on these containers and all hazardous waste containers generated in the future.
4. Placards not available, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.33. Placards were not available for the initial transporter. The generator must have placards on site to offer the initial transporter. Provide documentation to the Department that appropriate placards have been obtained.
5. "No Smoking" sign not posted, in violation of 10 CSR 25-5.262(2)(C)2.F(II). A "No Smoking" sign was not posted at the hazardous waste storage area where ignitable waste was stored. The facility must post "No Smoking" signs at the hazardous waste storage area and certify that the signs have been posted.
6. A satellite container not marked or dated, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(ii) as amended by 10 CSR 25-5.262(2)(C)3. One 55-gallon drum of D001 hazardous waste in the dry cleaning building satellite storage area was not marked or dated. The facility must mark the satellite container and all satellite containers used in the future identifying the contents and the beginning date of accumulation.
7. Generator's Missouri I.D. number missing from manifest, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a) as amended by 10 CSR 25-5.262(2)(B)1. The generator's Missouri I.D. number was missing from the manifest dated April 7, 1998, (attachment #5). The facility must record the Generator's Missouri I.D. number on all future manifests.
8. Missouri generator identification number and consecutive shipment number missing from the Missouri manifest document number, in violation of 10 CSR 25-5.262(2)(B)2.A. The

Missouri generator identification number and consecutive shipment number were missing from the Missouri manifest document number on the manifest dated April 7, 1998, (attachment #5). The facility must include the Missouri generator identification number and consecutive shipment number in the Missouri manifest document number on all future manifests.

9. Specific gravity of waste was not listed on the manifest, in violation of 10 CSR 25-5.262(2)(B)1 and 2. The manifest dated April 7, 1998 (attachment #5), listed waste quantity in gallons and did not contain the specific gravity of the material. The facility must list the specific gravity for wastes listed or measured in gallons, liters or cubic yards on all future manifests.
10. Contingency plan did not designate a primary emergency coordinator, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d). The name of the primary emergency coordinator was not in the contingency plan. The facility must designate a primary emergency coordinator in the contingency plan.
11. Facility does not meet the operating conditions of Resource Recovery Certification, in violation of 10 CSR 25-9.020(3)(E)3. A letter from Norman requesting renewal of the facility's Resource Recovery Certification dated November 21, 1997, (attachment #6) states that the facility has a closed loop solvent recovery operation and will recover no more solvents than can be processed in twenty-four hours. However, Mr. Matt Buha told Charles Heinzman and Mike Struckhoff in a meeting at the St. Louis Regional Office on June 5, 1998, that prior to distillation, dirty solvents are stored in the 1000 gallon tanks longer than twenty-four hours. These are the two tanks identified as "D" for dirty in attachment #3.

Mr. Tom Judge, Hazardous Waste Enforcement Unit, conducted a file review of Norman's resource recovery operation and sent a letter to Norman on December 16, 1994 (attachment #7). Mr. Judge determined that Norman's solvent collection and reclamation operation is not a totally enclosed treatment system and any points where waste is held or accumulated for more than twenty-four hours may be regulated as generator storage areas. Since the process is not a totally enclosed treatment system and dirty solvent is being held for longer than twenty-four hours, the facility must submit information to the Hazardous Waste Program updating the Resource Recovery Certification.

INFORMATION REQUEST

- A. Since the resource recovery unit is not a totally enclosed system and all dirty solvent is not processed in twenty-four hours, the 1000 gallon dirty solvent tanks are regulated hazardous waste storage tanks. Norman must submit documentation that the 1000 gallon dirty solvent storage tanks meet all of the applicable hazardous waste storage tank requirements listed in Section E on page 3 and 4 of the Inspection Record and Checklist (attachment #8).

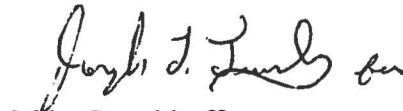
- B. The Department needs additional information from Norman concerning the residual oil that the facility is burning in the dual fuel boiler. Provide a detailed description of how the residual oil is generated in the distillation process and provide information about the chemical composition of the residual oil. The information should include any waste determination (analytical results) for the characteristic of toxicity made on the residual oil. Also provide information about any other processing that occurs before the residual oil is burned in the boiler.
- C. Provide any waste determination (analytical results) for the characteristic of toxicity made on the waste petroleum distillate from cleaning out the stills and the waste sludge from cleaning out the 1000 gallon above ground tanks.
- D. The November 21, 1997, letter from Norman to the Department lists the wrong EPA and MO ID numbers for the facility (attachment #6). Norman should submit the correct EPA and MO ID numbers (MOD031003569, 002738) for the facility on future correspondence.

Prepared by:



Charles Heinzman
Environmental Specialist
St. Louis Regional Office

Reviewed by:



Mike Struckhoff
Hazardous Waste Unit Chief
St. Louis Regional Office

CH:al

Attachments

c: HWP

ATTACHMENT 1

Prescott Avenue

Clarence

Wet Laundry

Storage

Dry
Cleaning
Building

waste oil
storage

solvent
storage

drummed
waste
storage
area

main electrical

The Norman Company

5900 North Broadway
St. Louis, Missouri

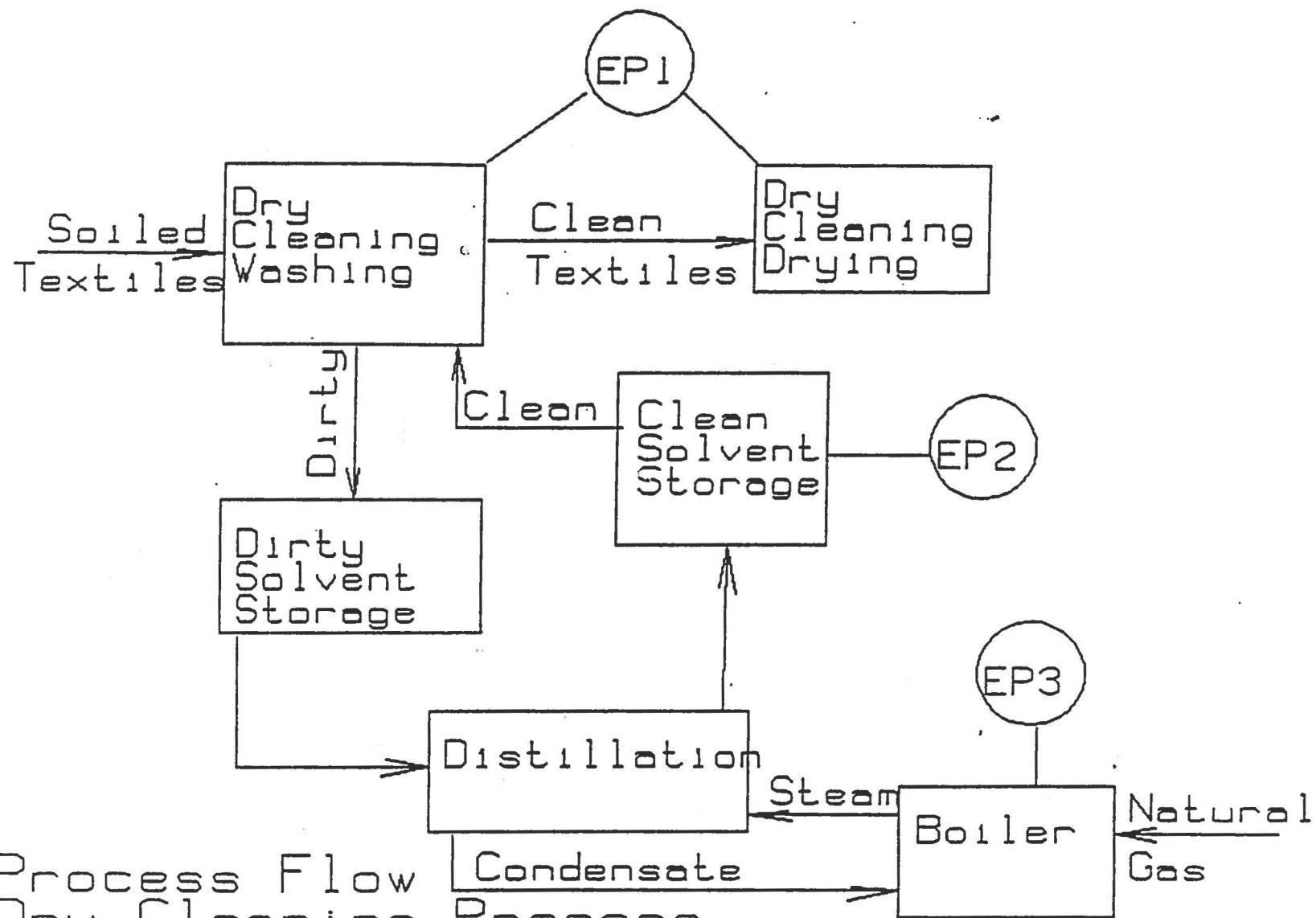
Offices

N ←

Broadway

EXHIBIT #5
PLOT PLAN

ATTACHMENT 2

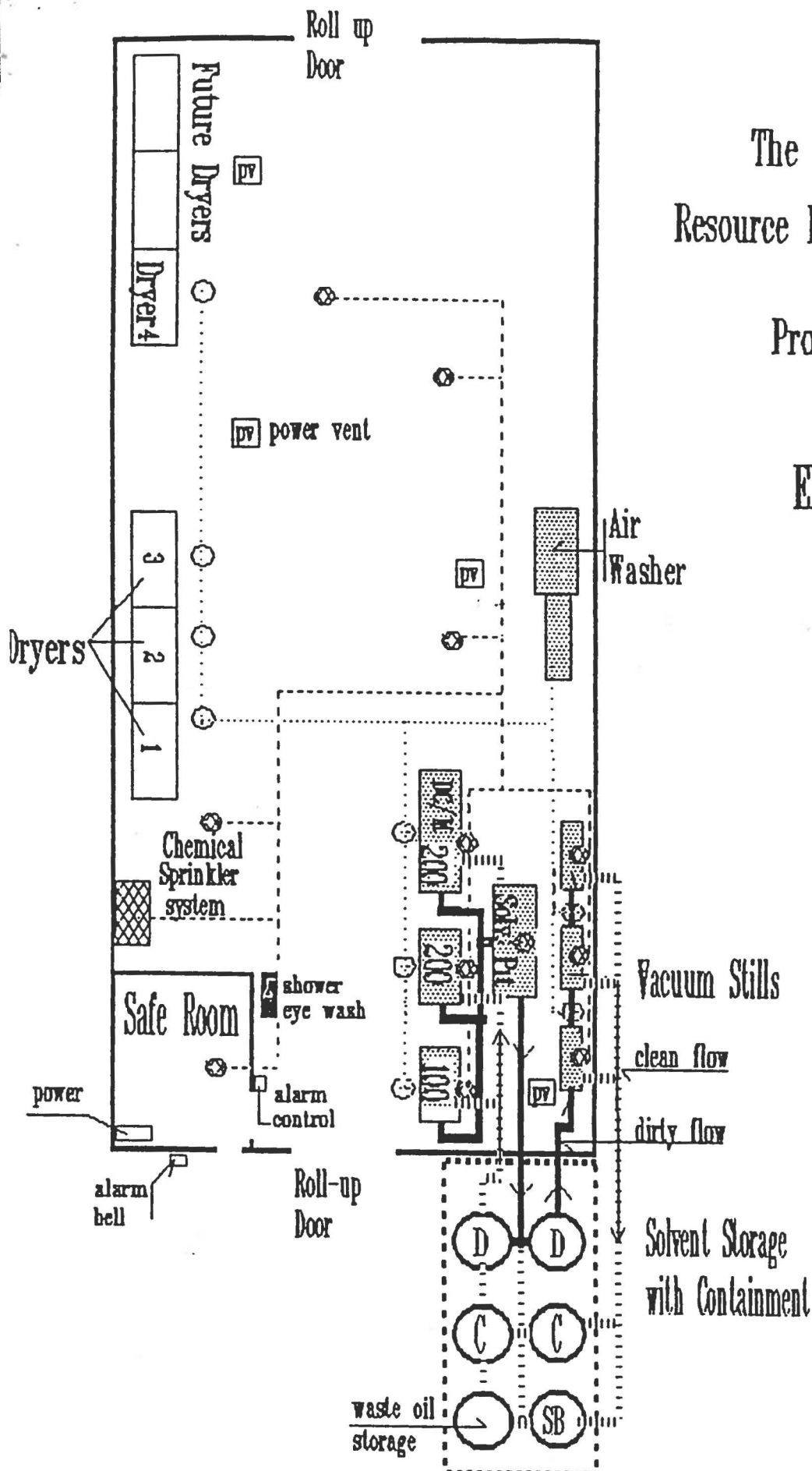


Process Flow
Dry Cleaning Process
The Norman Corporation

ATTACHMENT 3

The Norman Corp.
Resource Recovery Floor Plan
and
Process Diagram

EXHIBIT #2



ATTACHMENT 4

THE NORMAN CORPORATION
5900 North Broadway
St. Louis, MO 63147
(314) 382-5900

RESOURCE RECOVERY NARRATIVE

The dirty textiles, rags, industrial wipers, gloves and other recyclable textile products are placed in the dry cleaning machines. Once used solvent, from the last cycle of the previous load is pumped into the drycleaning machine and the first wash cycle is conducted. The dirty solvent will drain through a piping system connected into a storage pit. The pit is designed to contain the total contents of the dry clean machines without over-flowing (450 gallons).

After passing through a strainer into the pit, solvent is then transferred by pump to the two dirty solvent storage tanks. They are 1000- gallon tanks within a three-foot high containment wall.

After dirty solvent is transferred to the storage tanks it will then feed, by gravity, to two Washex Vacuum Stills; one with 200 gpm capacity, and two with 500 gpm capacity. Clean solvent, after distillation, is returned to the two clean tanks for re-use. Also, 1,000 gallon tanks inside the same containment as the dirty tanks.

Two waste streams will be generated by the distillation process. The still bottoms, which is classified as a solid and a liquid, both used for fuel blending. Profiles of this material, generated during startup testing, indicates the waste streams are D001.

The drycleaning building is a free standing separate building that meets all regulations of National Fire Protections Code 31. The building is equipped with four 12,000 CFM power vents, with a complete air-recovery/air washing system in place. All vents and controls are explosion proof.

All solvent will be stored in the tanks in the containment area outside the drycleaning building. Two tanks will be for dirty solvent, two for clean, one for waste/residual oil and one for standby use. All are interconnected to prevent over-filling. They are vented and connected to the air-washing units inside the drycleaning building.

ATTACHMENT 5

INSTRUCTIONS FOR THE COM-
PLETION OF THIS FORM ARE ON A
SEPARATE SHEET.

THIS DOCUMENT MUST BE USED
FOR ALL MISSOURI-DESTINED
SHIPMENTS

MISSOURI DEPARTMENT OF NATURAL RESOURCES
Division of Environmental Quality
Hazardous Waste Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3176

EMERGENCY RESPONSE
U.S. COAST GUARD
1-800-424-8802
CHEM TREC
1-800-474-9300
DEPT. OF NATURAL RESOURCES
314-634-2436

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M O D O 3 1 1 0 0 3 1 5 1 6 9 8 2 0 1	2. Page of 2	3. Information in the shaded areas is required by State law.
3. Generator's Name and Mailing Address 5900 North Broadway St. Louis, MO 63147		THE NORMAN CORP.	A. Missouri Manifest Document Number [REDACTED]	
4. Generator's Phone () 3 1 4 - 3 8 2 - 5 9 0 0			B. Generator's Site Address [REDACTED]	
5. Transporter 1 Company Name CHEMICAL CONSERVATION CORP.		6. US EPA ID Number F I L D 9 1 8 0 1 5 1 9 1 7 2	C. Manifest ID [REDACTED]	
7. Transporter 2 Company Name Chem-Met Services		8. US EPA ID Number M I D O 9 6 9 6 3 1 5 4	D. Manifest ID [REDACTED]	
9. Designated Facility Name and Site Address CHEMICAL CONSERVATION OF GA. 1612 James P. Rodgers Circle Valdosta, GA 31601		10. US EPA ID Number G A D O 9 1 3 1 3 8 0 1 8 1	E. Facility ID [REDACTED]	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers Number Type	13. Total Quantity	14. Unit Wt/Vol.
a. X RQ, Waste Petroleum distillates, n.o.s. (Stoddard Solvent) 3. UN1268, PG II		16	DM	55L
b.				
c.				
d.				
Additional Descriptions for Materials Listed Above		HANDLING CODE (FACILITY USE ONLY)		
a. [REDACTED]		b. [REDACTED]		
c. [REDACTED]		d. [REDACTED]		
15. Special Handling Instructions and Additional Information EMERGENCY RESPONSE: Chem-Trec 1-800-424-9300 EMERGENCY CONTACT: MATT DUNN		TR LICENSE IT XTC 846 AA 744V		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.				
Printed/Typed Name WALTER Gillian		Signature Walter Gillian		Month Day Year 1 41 719 8
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name DARAY WOODS		Signature Darryl Woods		Month Day Year 1 24 10 75 8
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Curt Cinglic		Signature Curt Cinglic		Month Day Year 1 0 4 1 1 0 19 8
19. Discrepancy Indication Space				
20. Designated Facility Owner or Operator Printed/Typed Name Charlotte Dorminey		Signature Charlotte Dorminey		Month Day Year 1 0 4 1 2 3 9 8

MISSOURI DNR FINAL COPY - PART 1
THIS COPY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED

SAFETY
HVS
10/10

TELEPHONE NUMBER

Generator's US EPA ID No. M. O. D. O. 3. 1. 0. 0. 3. 5. 6. 9		Manifest Document No. 9. 8. 0. 0. 1	22. Page 2 of 2	Information in the shaded areas is not required by Federal law.
THE NORMAN CORP. 5900 NORTH BROADWAY, ST. LOUIS, MO 63147 (314) 382-5900		L. State Manifest Document Number		
		M. State Generator's ID		
		N. State Transporter's ID		
24. Transporter 3 Company Name CHEMICAL CONSERVATION CORP.	25. US EPA ID Number F. L. D. 9. 8. 0. 5. 5. 9. 7. 2. 8	O. Transporter's Phone 314-3859-4444		
26. Transporter Company Name	27. US EPA ID Number	P. State Transporter's ID		
		Q. Transporter's Phone		

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	29. Containers		30. Total Quantity	31. Unit Wt/Vol	Waste No.
	No	Type			
a.					
b.					
c.					
d.					
e.					
f.					
g.					
h.					
i.					

S. Additional Descriptions for Materials Listed Above	T. Handling Codes for Waste Listed Above
CONTINUATION FOR ADDITIONAL TRANSPORTERS ONLY	

32. Special Handling Instructions and Additional Information		
33. Transporter 3 Acknowledgement of Receipt of Materials	Signature	Date
Printed/Typed Name DANNY WOODS	<i>Danny Woods</i>	Month Day Year 04/06/8
34. Transporter Acknowledgement of Receipt of Materials	Signature	Date
Printed/Typed Name		Month Day Year

35. Discrepancy Indication Space

ATTACHMENT 6



5900 North Broadway • St. Louis, Missouri 63147 • (314) 382-5900

November 21, 1997

Missouri Department of Natural Resources
Mr. Daniel A. Carey,
Environmental Engineer, Permits Section
Waste Management Program
P.O. Box 176
Jefferson City, MO 65102

RECEIVED

NOV 21 1997

HAZARDOUS WASTE
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

Dear Mr. Carey,

This is a request for a renewal for the registration for The Norman Corporation (TNC), Resource Recovery Operation Certification RR180, EPA ID# MODO29787090, MO ID# 004790, at its present location, 5900 North Broadway, St. Louis, MO 63147.

Norman has been a licensed Resource Recovery Facility in good standing since 1986. We are a modified industrial laundry and are the only facility registered in the state of Missouri.

Norman has always had and is continuing a closed loop solvent recovery operation, recovering no more solvents that can be processed in 24 hours and shipping all waste generated off-site each quarter. Since we store waste generated only by our own process and ship it promptly, we are not a Treatment Storage and Disposal Facility and do not wish to become one. This process is designed to service the needs of our customers and our concerns for the environment without storing large quantities of waste.

Norman is a great facility to help our customers eliminate waste. Historically, many of the products used to be thrown into dumpster, and with our service this has been eliminated through recycling shop towels, rags, gloves, mats, etc. Norman is a big part of the waste minimization programs required in industry today.

Attached are the following documents:

1. Certified Resource Recovery Facility Application
2. Resource Recovery narrative
3. Resource Recovery Floor Plan and Process Plan
4. Facility Plot Plan
5. Equipment List
6. Emergency/Contingency Plan
7. Financial Assurance

ATTACHMENT 7

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

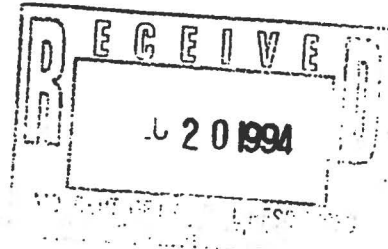
Mel Carnahan, Governor • David A. Shorr, Director

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

December 16, 1994

Mr. Matt Buha
The Norman Corporation
5900 North Broadway
St. Louis, MO 63147



Dear Mr. Buha:

In accordance with our telephone conversation today, I'm writing to answer your question concerning Mr. Charles Heinzman's December 12, 1994, letter to you. Based on what Mr. Heinzman has been able to communicate to me and what I have been able to determine from your Resource Recovery file, your solvent collection and reclamation operation is not a totally enclosed treatment system within the definition of 40 CFR 260.10. The solvent pit sumps are not constructed to prevent emissions to the air, and the transfer of contaminated solvent through your processing operation is part of a reclamation, not a production, operation. Before reclamation, the dirty solvent is a hazardous waste and points of accumulation or storage of that waste will be under the hazardous waste generator regulations of 10 CSR 25-5.262. Any compliance review of your facility under the hazardous waste laws and regulations should examine whether flow is continuous and uninterrupted (i.e., no discontinuities in transport) in the processing operation. Any points where waste is held or accumulated during processing may be regulated as generator storage areas, and these points should be examined to determine if flow is continuous, especially if there are any points where flow is interrupted and waste is held more than twenty-four hours.

Please write me at the letterhead address if you have any questions concerning this letter.

Sincerely,

HAZARDOUS WASTE PROGRAM

Tom Judge
Acting Chief
Hazardous Waste Enforcement Unit

TJ:tjb

c: St. Louis Regional Office

ATTACHMENT 8



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
LARGE QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

L
LOG-INSF

FOR FACILITIES THAT GENERATE/ACCUMULATE > 1000 Kg (2,200 lbs. or approximately 5 drums)					
NAME <i>The Norman Corporation</i>		DATE <i>June 3, 1998</i>		EPA ID NUMBER <i>MO D031003569</i>	
ADDRESS <i>5900 North Broadway</i>		RR NO <i>RR0180</i>		MO ID NUMBER <i>002738</i>	
CITY <i>St. Louis 63147</i>	COUNTY <i>St. Louis City</i>	# OF EMPLOYEES <i>45</i>	YEARS AT SITE <i>5</i>	TELEPHONE NUMBER <i>(314) 382-5900</i>	
FACILITY REPRESENTATIVE(S), TITLE(S) <i>Matt Buha, President ; Walter Gilliam, Plant Manager</i>					
DATE(S) OF LAST INSPECTION(S) <i>Resource Recovery Inspection 6/16/94</i>					
LATITUDE DEG ____ MIN ____ SEC ____			LONGITUDE DEG ____ MIN ____ SEC ____		

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

Norman Corp. is a commercial laundry and dry cleaner specializing in cleaning gloves, shop towels and lab coats for businesses. The waste water from the wet laundry is treated before it goes to the Metropolitan St. Louis Sewer District. The waste filtercake is disposed of as a special waste at the Milam Recycling & Disposal Facility in East St. Louis, IL. The facility is a large quantity generator of hazardous waste and has a resource recovery certification for the distillation of spent solvents generated on-site. Waste carbon and oil from the caustic wash used to clean the still are skimmed off and disposed of as a hazardous waste. The waste from cleaning the 1000 gallon dirty solvent tanks is also disposed of as a hazardous waste. Residual oil from distillation of the dirty solvent is burned in the dual fuel boiler.

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA WASTE CODE(S)	DISPOSITION
1. waste petroleum distillates, (stoddard solvent) from cleaning stills.	300 gallons per month	D001	Chemical Conservation of GA
2. waste petroleum distillates, sludge from cleaning 1000 gallon tanks	50 gallons per month	D001	Chemical Conservation of GA
3.			
4.			
5.			

A. GENERAL

1. <input checked="" type="checkbox"/> Registered as a hazardous waste generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A).	1	GGR	COMMENTS
2. <input checked="" type="checkbox"/> Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CR 262.11.	1	GGR	
3. <input checked="" type="checkbox"/> Utilizes a licensed hazardous waste transporter - Section 260.380.1(5) RSMo.	1	GGR	
4. <input checked="" type="checkbox"/> Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo.	1	GGR	
5. <input checked="" type="checkbox"/> Facility does not operate as a TSD - Section 260.390(1) RSMo.	1	GGR	

PART 1: WALK-THROUGH INSPECTION

B. PRETRANSPORT, CONTAINERIZATION & STORAGE

1. <input checked="" type="checkbox"/> Storage does not exceed 90 days or 180/270 days if facility generates < 1000 Kg/month - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a).	1	GPT	<p>COMMENTS</p> <p>No containment for 1075 gallons of liquid hazardous waste stored on the east side of the wet laundry (inside).</p> <p>19-55 gallon + 1-30 gallon drums were not labeled. Stored on the east side of the wet laundry. The date of accumulation was not marked on 19-55 gallon and 1-30 gallon drums.</p> <p>No placards.</p> <p>No "No Smoking" sign in hazardous waste storage area.</p>
2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.171.	1	GPT	
3. <input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.172.	1	GPT	
4. <input checked="" type="checkbox"/> Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a).	1	GPT	
5. <input checked="" type="checkbox"/> Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.177(c).	1	GPT	
6. <input type="checkbox"/> Container storage areas have a containment system if holding more than 1000 Kg of liquid hazardous waste - 10 CSR 25-5.262(2)(C)2.D(i).	1	GOR	
7. <input type="checkbox"/> Base of containment system is impervious and free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.D(iii)(a). N/A	2	GOR	
8. <input checked="" type="checkbox"/> Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.D(iii)(b).	2	GOR	
9. <input type="checkbox"/> Capacity of containment system = 10% of waste volume or volume of largest container, whichever is greater - 10 CSR 25-5.262(2)(C)2.D(iii)(c). N/A	2	GOR	
10. <input checked="" type="checkbox"/> Run-on onto the containment system is prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.D(iii)(d).	2	GOR	
11. <input checked="" type="checkbox"/> Accumulated liquids removed to prevent overflow of containment - 10 CSR 25-5.262(2)(C)2.D(iii)(e).	2	GOR	
12. <input checked="" type="checkbox"/> Containers of ignitable or reactive waste stored 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262(2)(C)6 referencing 40 CFR 265.178 as amended by 10 CSR 25-7.265(2)(i)7 and 8.	2	GPT	
13. <input checked="" type="checkbox"/> Containers clearly marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3).	2	GPT	
14. <input type="checkbox"/> Waste packaged/labeled/ marked per DOT during entire on-site storage period - 10 CSR 25-5.262(2)(C)1.	2	GPT	
15. <input type="checkbox"/> Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2).	2	GPT	
16. <input checked="" type="checkbox"/> Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.C(i) and (ii) referencing 40 CFR 265.174.	2	GPT	
17. <input checked="" type="checkbox"/> Daily inspection of areas subject to spills, i.e., waste handling areas - 10 CSR 25-5.262(2)(C)2.C(ii) referencing 40 CFR 265.195.	2	GOR	
18. <input checked="" type="checkbox"/> Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.35.	2	GPT	
19. <input type="checkbox"/> Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33.	2	GPT	
20. <input type="checkbox"/> "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.F(ii).	2	GOR	

C. SATELLITE ACCUMULATION

1. <input checked="" type="checkbox"/> Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a).	1	GPT	COMMENTS
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2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171.	1	GPT	COMMENTS <i>1-55 gallon drum in the dry cleaning building was not marked indentifying contents and beginning date.</i>
3. <input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172.	1	GPT	
4. <input checked="" type="checkbox"/> Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1).	1	GPT	
5. <input checked="" type="checkbox"/> Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(2).	1	GPT	
6. <input type="checkbox"/> Container marked identifying contents and beginning date - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(ii) as amended by 10 CSR 25-5.262(2)(C)3.	2	GOR	
7. <input checked="" type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	2	GOR	

D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.31.	1	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32 as amended by 10 CSR 25-5.262(2)(C)2.G.	2	GPT	
3. <input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(c) & (d).	2	GPT	
4. <input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.34(a).	2	GPT	
5. <input checked="" type="checkbox"/> Telephone or two-way radio on-site and capable of summoning local fire or police department - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(b).	2	GPT	
6. <input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.33.	2	GPT	

E. LQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.				
2.				
3.				
4.				
5.				

1. <input type="checkbox"/> Spill prevention controls in place and operating e.g. check valves, dry discount couplings - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(1).	1	GPT	COMMENTS <i>1000 gallon dirty solvent storage tanks were not inspected as hazardous waste storage tanks. see report.</i>
2. <input type="checkbox"/> Overfill prevention controls in place and operating e.g. high level alarms, automatic feed cutoff, etc. - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(2).	1	GPT	
3. <input type="checkbox"/> Sufficient freeboard in uncovered tanks to prevent overtopping - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(3).	1	GPT	
4. <input type="checkbox"/> Waste or treatment method compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(a).	1	GPT	
5. <input type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.199(a).	1	GPT	
6. <input type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(a)(1) and (2).	1	GPT	
7. <input type="checkbox"/> Ignitable or reactive wastes treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(b).	1	GPT	

			COMMENTS
8. <input type="checkbox"/> Volatiles with vapor pressure > 78 mm @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.F(I).	1	GOR	1000 gallon dirty solvent storage tanks were not inspected as hazardous waste storage tanks. See report.
9. <input type="checkbox"/> Wastes and residues removed as hazardous waste and tank and equipment decontaminated upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.197(a).	1	GPT	
10. <input type="checkbox"/> Secondary containment system provided for tanks and equipment; installed after July 14, 1986; storing dioxin waste; over 15 years old; of unknown age in facility over 15 years old; repaired, replaced or reinstalled after July 14, 1986 - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a).	1	GPT	
11. <input type="checkbox"/> Secondary containment system constructed of or lined with waste compatible material of sufficient strength and thickness - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(1).	2	GPT	
12. <input type="checkbox"/> Containment system supported by base capable of preventing failure due to settlement, compression or uplift - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(2).	2	GPT	
13. <input type="checkbox"/> Containment system provided with a leak detection system capable of detecting a release within 24 hours - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(3).	2	GPT	
14. <input type="checkbox"/> Containment system sloped or designed to drain and remove liquids - 10 CSR 25-5.262(2)(C)2.E referencing 10 CSR 25-5.262(2)(C)2.D (III)(b).	2	GOR	
15. <input type="checkbox"/> Containment system capable of containing 100% of the capacity of the largest tank - 10 CSR 25-5.262(2)(C)2.E referencing 10 CSR 25-5.262(2)(C)2.D (III)(c).	2	GOR	
16. <input type="checkbox"/> Containment system free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.E referencing 10 CSR 25-5.262(2)(C)2.D (III)(a).	2	GOR	
17. <input type="checkbox"/> Run-on onto containment system prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.E referencing 10 CSR 25-5.262(2)(C)2.D (III)(d).	2	GOR	
18. <input type="checkbox"/> Spilled or leaked waste and precipitation removed from secondary containment within 24 hours or as soon as possible - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(4).	2	GPT	
19. <input type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3).	2	GPT	
20. <input type="checkbox"/> Daily inspections of overfill/spill control equipment, aboveground portions of tank system, secondary containment, and data gathered from monitoring equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(a).	2	GPT	
21. <input type="checkbox"/> Inspection log maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(c).	2	GPT	
22. <input type="checkbox"/> Cathodic protection systems inspected annually, impressed current sources every two months - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(b).	2	GPT	
23. <input type="checkbox"/> Detailed written assessment by an independent, qualified, professional engineer for tanks installed after July 14, 1986, prepared and on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.192.	2	GPT	
24. <input type="checkbox"/> Written assessment by an independent, qualified, professional engineer prepared and on-site for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.191.	2	GPT	
25. <input type="checkbox"/> Leak test, internal inspection or tank integrity exam performed annually and documented, by an independent, qualified, professional engineer for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(i).	2	GPT	
26. <input type="checkbox"/> Leak/spill response resulted in: waste flow stopped immediately; waste removal; containment and removal of visible releases to the environment; notification and report; and repair or closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.196.	2	GPT	

PART 2: RECORDS INSPECTION

F. MANIFESTS

			COMMENTS
1. <input checked="" type="checkbox"/> Facility uses manifest system - 260.380.1(6) RSMo and 10 CSR 25-5.262(2)(B).	1	GMR	Manifest dated 4/7/98 did not have MO I.D. number and consecutive shipment number.
2. <input checked="" type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a).	2	GRR	
3. <input type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a) as amended by 10 CSR 25-5.262(2)(B)1.	2	GOR	
4. <input type="checkbox"/> Manifest document ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A.	2	GOR	
5. <input checked="" type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.	2	GMR	
6. <input checked="" type="checkbox"/> All transporters' names, phone numbers, MO & EPA I.D. #'s, license plate # - 10 CSR 25-5.262(2)(B)1 and 2.	2	GMR	
7. <input checked="" type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)1 and 2.	2	GMR	
8. <input checked="" type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)1 and 2.	2	GMR	
9. <input type="checkbox"/> Containers, quantity and <u>specific gravity</u> designated - 10 CSR 25-5.262(2)(B)1 and 2.	2	GMR	
10. <input checked="" type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)1.	2	GMR	
11. <input checked="" type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A.	2	GOR	
12. <input checked="" type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1.	2	GOR	
13. <input checked="" type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C.	2	GRR	Manifest dated 4/7/98 did not list the specific gravity of the waste.
14. <input checked="" type="checkbox"/> Manifest summary reports and manifest sent to DNR quarterly OR annually if one or no shipments are made - 10 CSR 25-5.262(2)(D)1.B. and 10 CSR 25-5.262(2)(D)1.E.	2	GOR	

G. LAND DISPOSAL RESTRICTIONS

			COMMENTS
1. <input checked="" type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a).	1	GLB	
2. <input checked="" type="checkbox"/> Dilution of waste to meet LDR treatment standards is not occurring - 10 CSR 25-7.268(1) incorporating 40 CFR 268.3(a).	1	GLB	
3. <input checked="" type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(b) (4) and (5).	2	GLB	

H. PERSONNEL TRAINING

			COMMENTS
1. <input checked="" type="checkbox"/> Personnel are trained to respond to emergencies including the use of alarm systems, emergency equipment and contingency plan - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3).	2	GPT	
2. <input checked="" type="checkbox"/> Employees do not work in unsupervised positions until they have completed the training - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(b).	2	GPT	
3. <input checked="" type="checkbox"/> Training reviewed annually - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(c).	2	GPT	
4. <input checked="" type="checkbox"/> Program director trained in hazardous waste management procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(2).	2	GPT	
5. <input checked="" type="checkbox"/> Personnel training plan on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d).	2	GPT	
6. <input checked="" type="checkbox"/> Gives job title, job description and name of employee filling each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1) and (2).	2	GPT	

7. <input checked="" type="checkbox"/> Written description of introductory and continuing training that will be given to each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3).	2	GPT	COMMENTS
8. <input checked="" type="checkbox"/> Documentation of training completed by personnel - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(4).	2	GPT	
9. <input checked="" type="checkbox"/> Records of current personnel maintained until facility closure, former employee records maintained for at least three years - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(e).	2	GPT	
I. CONTINGENCY PLAN			
1. <input checked="" type="checkbox"/> Contingency plan maintained on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(a).	2	GPT	COMMENTS <i>Primary emergency coordinator not designated.</i>
2. <input checked="" type="checkbox"/> Plan submitted to local emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b).	2	GPT	
3. <input checked="" type="checkbox"/> Emergency coordinator on-site or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.55.	2	GPT	
4. <input checked="" type="checkbox"/> Plan describes actions personnel must take in response to fires, explosions or other releases of hazardous waste - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(a).	2	GPT	
5. <input checked="" type="checkbox"/> Describes arrangements with emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c).	2	GPT	
6. <input checked="" type="checkbox"/> Lists names, addresses and phone numbers (home and office) of emergency coordinators - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d).	2	GPT	
7. <input type="checkbox"/> Primary emergency coordinator designated - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d).	2	GPT	
8. <input checked="" type="checkbox"/> List emergency equipment including description, location and capabilities - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e).	2	GPT	
9. <input checked="" type="checkbox"/> Evacuation plan, if applicable, designates primary and secondary routes and evacuation signal - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f).	2	GPT	
J. USED OIL STORAGE			
1. <input checked="" type="checkbox"/> Used oil is managed properly and not disposed of into the environment or cause a public nuisance - 10 CSR 25-11.279(2)(B)4.B.	1		COMMENTS
2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(1).	2		
3. <input checked="" type="checkbox"/> Containers storing used oil are not leaking - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(2).	2		
4. <input checked="" type="checkbox"/> Containers/aboveground tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(1).	2		
5. <input type="checkbox"/> Fill pipes used to transfer used oil into underground storage tanks are labeled or marked clearly "Used Oil" - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(2). <i>N/A</i>	2		
6. <input checked="" type="checkbox"/> Containers/tanks which are exposed to rainfall are closed - 10 CSR 25-11.279(2)(C)6.	2		
7. <input checked="" type="checkbox"/> Clean up any spills or leaks of used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(d).	2		
8. <input checked="" type="checkbox"/> Mixtures of used oil and hazardous waste are properly managed - 10 CSR 25-11.279(2)(B)2.	2		
K. ON-SITE BURNING			
1. <input checked="" type="checkbox"/> Burn only their own used oil or used oil from DIY'ers or exempt farmers - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(a).	1		
2. <input type="checkbox"/> Burn only in space heaters with design capacity < .5 million BTU/hr - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(b). <i>N/A</i>	1		
3. <input type="checkbox"/> Combustion gases from the heater are vented to the ambient air - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(c). <i>N/A</i>	1		

L. OFF-SITE SHIPMENTS TO APPROVED COLLECTION CENTERS

1. <input type="checkbox"/> Used oil is transported by transporters who have obtained EPA identification numbers - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24. <i>N/A</i>	1
(If no licensed transporter is used)	
2. <input type="checkbox"/> Transports used oil in a vehicle owned by the generator or owned by an employee of the generator - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(1). <i>N/A</i>	2
3. <input type="checkbox"/> Transports no more than 55 gallons of used oil at any time - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(2). <i>N/A</i>	2
4. <input type="checkbox"/> Transports the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(3). <i>N/A</i>	2
OR	
5. <input type="checkbox"/> Transports the used oil to an aggregation point that is owned and/or operated by the same generator - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(b)(3). <i>N/A</i>	2
OR	
6. <input type="checkbox"/> Used oil is reclaimed under a contractual agreement (tolling arrangement) - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(c). <i>N/A</i>	2

M. RESOURCE RECOVERY

1. <input checked="" type="checkbox"/> RR certification for energy recovery or reclamation of hazardous waste on-site - 10 CSR 25-9.020(1)(A)3.	1	GOR
2. <input checked="" type="checkbox"/> Still bottoms or RR residues disposed of properly - Section 260.380.1(7) RSMo.	1	GOR
3. <input checked="" type="checkbox"/> Facility is classified as U, R1 or R2 accurately - 10 CSR 25-9.020(3)(A)	2	GOR
4. <input checked="" type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(3)(E)3.	2	GOR
5. <input checked="" type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E) 1 and 2.	2	GOR
6. <input checked="" type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E) 6 referencing 10 CSR 25-7.264(2)(E)3.	2	GOR
7. <input checked="" type="checkbox"/> Facility maintains a written operating record - 10 CSR 25-9.020(3)(E) 5 referencing 40 CFR 264.73(b)(1) & (2) as modified by 10 CSR 25-7.264(2)(E)2.	2	GOR
8. <input type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103. <i>N/A</i>	2	GOR
9. <input type="checkbox"/> R2 facility uses an adequate sampling and analysis plan to assess incoming shipments - 10 CSR 25-9.020(3)(C)1. <i>N/A</i>	2	GOR
10. <input type="checkbox"/> R2 facility maintains a daily log of manifest number, wastes received, disposition of waste and corresponding sampling data - 10 CSR 25-9.020(3)(C)2. <i>N/A</i>	2	GOR
11. <input type="checkbox"/> R2 facility has a written closure plan which meets 40 CFR 264.112 requirements - 10 CSR 25-9.020(3)(C)3 referencing 10 CSR 25-7.264(2)(G). <i>N/A</i>	2	GOR
12. <input type="checkbox"/> R2 facility provides financial assurance for closure - 10 CSR 25-9.020(3)(C)4. <i>N/A</i>	2	GOR

COMMENTS

Dirty solvents stored in 1000 gallon tanks longer than 24 hours.

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable.

An item emphasized by a black line on the left is a serious deviation from the requirements (Class I violation)

An unemphasized item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

Check all Potential Multi-Media Violations and Impacts (specify and comment below if possible)

APC		PDW	
<input type="checkbox"/> Fugitive Dust	<input type="checkbox"/> Asbestos	<input type="checkbox"/> Taste & Odors	<input type="checkbox"/> Color
<input type="checkbox"/> Particulate	<input type="checkbox"/> Odors	<input type="checkbox"/> Bacteria	<input type="checkbox"/> Flow
<input type="checkbox"/> Burning	<input type="checkbox"/> Toxics	<input type="checkbox"/> Pressure	<input type="checkbox"/> Toxics
<input type="checkbox"/> Other		<input type="checkbox"/> Other	
SWM		HW	
<input type="checkbox"/> Open Dumps	<input type="checkbox"/> SLF	<input type="checkbox"/> Transportation	<input type="checkbox"/> USTs/LUSTs
<input type="checkbox"/> Littering	<input type="checkbox"/> Other	<input type="checkbox"/> PCBs	<input type="checkbox"/> Other
<input type="checkbox"/> Waste Tire Dump			
WPC			
<input type="checkbox"/> Animal Waste	<input type="checkbox"/> Sawdust	<input type="checkbox"/> Ground Water	
<input type="checkbox"/> Bypassing	<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	
<input type="checkbox"/> Treatment Plant Oper.	<input type="checkbox"/> Single Family	<input type="checkbox"/> Other	

COMMENTS:

INSPECTOR'S SIGNATURE

Charles H. Hinzman

DATE

June 11, 1998



MISSOURI DEPARTMENT OF NATURAL RESOURCES

NOTICE OF VIOLATION PURSUANT TO REQUIREMENTS OF THE MISSOURI
HAZARDOUS WASTE MANAGEMENT LAW, RULES AND REGULATIONS

5118

Page 1 of 2

FACILITY NAME <u>The Norman Corporation</u>			
ADDRESS <u>5900 N. Broadway</u>		CITY <u>St. Louis</u>	STATE <u>MO</u>
MISSOURI ID NUMBER <u>002738</u>		DATE OF INSPECTION <u>June 3, 1998</u>	

During an inspection and/or a review of information or documentation completed this date to determine compliance with the requirements of the Missouri Hazardous Waste Management Law, Section 260.350 - 260.550 RSMo, and/or the Rules and Regulations 10 CSR 25 the following violations were identified. The 40/49 CFR regulations cited below have been adopted by reference in the Missouri Hazardous Waste Regulations.

CITATION	DESCRIPTION OF VIOLATION
10CSR 25-5.262(2)(C)2.D(1)	No Containment system
10CSR 25-5.262(2)(C)1	Containers of hazardous waste not labeled
40 CFR 262.34(a)(2)	Date of accumulation not marked on containers
40 CFR 262.33	No placards available for transporter
10CSR 25-5.262(2)(C)2.F(1)	No "No smoking" sign by ignitable waste
10CSR 25-5.262(2)(C)3	Satellite container not marked identifying contents and beginning date of accumulation
10CSR 25-5.262(2)(B)1	Generator's Missouri ID Number not on manifest
10CSR 25-5.262(2)(B)2.A	^{Missouri} No manifest document number
10CSR 25-5.262(2)(B)1 and 2	Specific gravity not listed on the manifest

This information is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order issued pursuant to Section 260.410, RSMo and may not be a complete listing of all violations which may be identified as a result of this inspection.

The owner/operator is hereby requested to submit in writing within 15 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions to be taken to: Chief, Enforcement Section, Hazardous Waste Program, Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102 with a copy to the Director, St. Louis Regional Office, 10805 Sunset Office Dr., Suite 100, St. Louis, MO

63127

The corrective actions taken within 15 days of this notice will be considered in determining whether enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this notice or wish to discuss your response, you may call Charles Heinzman at (314) 822-0101 or Kathy Flippin at (573) 251-3176

Signature of Preparer Charles Heinzman

Date June 17, 1998

The undersigned person hereby acknowledges that he/she received a copy of this Notice and has read same.

SIGNATURE <u>Sent by certified mail</u>	PRINTED NAME
TITLE	DATE

**NOTICE OF VIOLATION PURSUANT TO REQUIREMENTS OF THE MISSOURI
HAZARDOUS WASTE MANAGEMENT LAW, RULES AND REGULATIONS**

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FACILITY NAME <u>The Norman Corporation</u>			
ADDRESS <u>5900 N. Broadway</u>	CITY <u>St. Louis</u>	STATE <u>MO</u>	ZIP CODE <u>63147</u>
MISSOURI ID NUMBER <u>002738</u>		DATE OF INSPECTION <u>June 3, 1998</u>	

During an inspection and/or a review of information or documentation completed this date to determine compliance with the requirements of the Missouri Hazardous Waste Management Law, Section 260.350 - 260.550 RSMo, and/or the Rules and Regulations 10 CSR 25 the following violations were identified. The 40/49 CFR regulations cited below have been adopted by reference in the Missouri Hazardous Waste Regulations.

CITATION	DESCRIPTION OF VIOLATION
40 CFR 265.52(d)	Primary emergency coordinator not designated
10 CSR 25-9.020(3)(E)3	Facility does not meet the operating conditions of certification.

This information is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order issued pursuant to Section 260.410, RSMo and may not be a complete listing of all violations which may be identified as a result of this inspection.

The owner/operator is hereby requested to submit in writing within 15 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions to be taken to: Chief, Enforcement Section, Hazardous Waste Program, Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102 with a copy to the Director, St. Louis Regional Office, 10805 Sunset Office Dr., Suite 100, St. Louis, MO

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If you have any questions on this notice or wish to discuss your response, you may call Charles Heinzman at (314) 822-0101 or Kathy Flippin at (573) 751-3176.

Signature of Preparer Charles Heinzman Date June 17, 1998

The undersigned person hereby acknowledges that he/she received a copy of this Notice and has read same.

SIGNATURE <u>Sent by certified mail</u>	PRINTED NAME
TITLE	DATE